UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MARY BLACK, individually and on   :   Case No.: 1:15-cv-01234-SJ
behalf of all others similarly situated,   :

                                       :   Date Filed: March 10, 2015

            Plaintiff,   :

                                       :   Hon. Sterling Johnson, Jr.

      v.   :

                                       :   **Notice of Voluntary Dismissal**

FRONTIER UTILITIES, LLC, a Texas   :   **Pursuant to Fed. R. Civ. P. 41**
limited liability company,   :

                                       :

        Defendant.   :

                                       :

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NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO FED. R. CIV. P. 41

    PLEASE TAKE NOTICE that Plaintiff Mary Black ("Plaintiff"), by and through her undersigned counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily dismisses all claims in this action *without prejudice* as to Defendant Frontier Utilities, LLC ("Defendant"). In support of the instant notice, Plaintiff states as follows:

    1.   Plaintiff filed the instant action on March 10, 2015. (Dkt. 1.)

    2.   Fed. R. Civ. P. 41(a)(1)(A) provides, in relevant part, that a "plaintiff may dismiss an action without a court order by filing: (i) a notice of dismissal before the opposing party serves either an answer or a motion for summary judgment."

    3.   Defendant has not filed an answer nor a motion for summary judgment in this action.
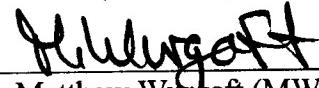
4.   Accordingly, the action may be dismissed *without prejudice* and without an order of the Court.

Respectfully submitted,

MARY BLACK, individually and on behalf of all others similarly situated,

Dated: June 15, 2015   By: _____
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                                              Pro hac vice admission to be sought.

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